

11 IN RE: SOCIAL MEDIA ADOLESCENT
12 ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

1.4 THIS DOCUMENT RELATES TO:

15 | ALL ACTIONS

CASE No.: 4:22-03047-YGR-PHK

Pursuant to Civil Local Rules 6-1(b) and 6-2, the parties, through their undersigned counsel, hereby stipulate and respectfully request that the Court extend the deadline for Plaintiffs and Defendants Google, LLC and YouTube, LLC (together, “YouTube” or “Defendants”) to finalize search term negotiations from May 31, 2024 to June 7, 2024, with any necessary letter briefing to be submitted five business days thereafter (and no later than June 14). The parties declare in support of this request:

1. Plaintiffs and YouTube are engaged in ongoing search term negotiations relating to Plaintiffs’ already served Requests for Production.

2. Plaintiffs and YouTube mutually agree that they would benefit from more time to continue their conferrals and attempt to narrow disputes regarding search terms.

3. Plaintiffs and YouTube believe that an extension until June 7 to finalize negotiations will afford adequate time for such negotiations.

4. Extending this deadline will not affect any other deadline affixed by the Court.

5. This is the second request to extend this deadline.¹

THEREFORE, pursuant to Local Rules 6-1(b) and 6-2, the parties stipulate and respectfully request that the Court extend the deadline for Plaintiffs and YouTube to finalize search term negotiations to June 7, with any necessary letter briefing to be submitted five business days after the parties complete those discussions (no later than June 14).

IT IS SO ORDERED,

DATED: June 3, 2024


PETER H. KANG
UNITED STATES MAGISTRATE JUDGE

IT IS SO STIPULATED AND AGREED.

¹ Pursuant to DMC Order No. 6 (ECF 875), the Court originally ordered that search term discussions *and briefing* be concluded by May 31, 2024. On May 23, 2024, the parties requested, and the Court granted on the record, a modification to the order that discussions be concluded by May 31, 2024 but that briefing would be concluded by June 7, 2024. *See* May 23, 2024 Hr’g Tr.

1 Respectfully submitted,

2 DATED: May 31, 2024

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

3
4 By: /s/ Christopher Chiou
Christopher Chiou (State Bar No. 233587)
Matthew K. Donohue (State Bar No. 302144)
5 **WILSON SONSINI GOODRICH & ROSATI PC**
953 East Third Street, Suite 100
6 Los Angeles, CA 90013
Telephone: (323) 210-2900
7 Facsimile: (866) 974-7329
Email: cchiou@wsgr.com
8 Email: mdonohue@wsgr.com

9
10 Brian M. Willen (*pro hac vice*)
WILSON SONSINI GOODRICH & ROSATI PC
1301 Avenue of the Americas, 40th Floor
11 New York, New York 10019
Telephone: (212) 999-5800
12 Facsimile: (212) 999-5899
Email: bwillen@wsgr.com

13
14 Lauren Gallo White (State Bar No. 309075)
Samantha A. Machock (State Bar No. 298852)
WILSON SONSINI GOODRICH & ROSATI PC
15 One Market Plaza, Spear Tower, Suite 3300
San Francisco, CA 94105
16 Telephone: (415) 947-2000
Facsimile: (415) 947-2099
17 Email: lwhite@wsgr.com
Email: smachock@wsgr.com

18 *Attorneys for Defendants YouTube, LLC and*
19 *Google LLC*

20 DATED: May 31, 2024

21 By: /s/ Lexi J. Hazam
LEXI J. HAZAM
LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP
22 275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
23 Telephone: 415-956-1000
lhazam@lchb.com

24
25 **PREVIN WARREN**
MOTLEY RICE LLC
401 9th Street NW Suite 630
26 Washington DC 20004
Telephone: 202-386-9610
27 pwarren@motleyrice.com

28 Co-Lead Counsel

CHRISTOPHER A. SEEGER
SEEGER WEISS, LLP

55 Challenger Road, 6th floor
Ridgefield Park, NJ 07660
Telephone: 973-639-9100
Facsimile: 973-679-8656
cseeger@seegerweiss.com

Counsel to Co-Lead Counsel and Settlement
Counsel

JENNIE LEE ANDERSON
ANDRUS ANDERSON, LLP

155 Montgomery Street, Suite 900
San Francisco, CA 94104
Telephone: 415-986-1400
jennie@andrusanderson.com

Liaison Counsel

JOSEPH G. VANZANDT
**BEASLEY ALLEN CROW METHVIN
PORTIS & MILES, P.C.**

234 Commerce Street
Montgomery, AL 36103
Telephone: 334-269-2343
joseph.vanzandt@beasleyallen.com

EMILY C. JEFFCOTT
MORGAN & MORGAN
220 W. Garden Street, 9th Floor
Pensacola, FL 32502
Telephone: 850-316-9100
ejeffcott@forthepeople.com

Federal/State Liaison Counsel

MATTHEW BERGMAN
SOCIAL MEDIA VICTIMS LAW CENTER

821 Second Avenue, Suite 2100
Seattle, WA 98104
Telephone: 206-741-4862
matt@socialmediavictims.org

JAMES J. BILSBORROW
WEITZ & LUXENBERG, PC

700 Broadway
New York, NY 10003
Telephone: 212-558-5500
Facsimile: 212-344-5461
jbilsborrow@weitzlux.com

JAYNE CONROY
SIMMONS HANLY CONROY, LLC

112 Madison Ave, 7th Floor
New York, NY 10016

Telephone: 917-882-5522
jconroy@simmonsfirm.com

ANDRE MURA
GIBBS LAW GROUP, LLP
1111 Broadway, Suite 2100
Oakland, CA 94607
Telephone: 510-350-9717
amm@classlawgroup.com

ALEXANDRA WALSH
WALSH LAW
1050 Connecticut Ave, NW, Suite 500
Washington D.C. 20036
Telephone: 202-780-3014
awalsh@alexwalshlaw.com

MICHAEL M. WEINKOWITZ
LEVIN SEDRAN & BERMAN, LLP
510 Walnut Street Suite 500
Philadelphia, PA 19106
Telephone: 215-592-1500
mweinkowitz@lfsbalw.com

Plaintiffs' Steering Committee Leadership

RON AUSTIN
RON AUSTIN LAW
400 MANHATTAN BLVD
HARVEY, LA 70058
Telephone: 504-227-8100
raustin@ronaustinlaw.com

PAIGE BOLDT
WATTS GUERRA LLP
4 Dominion Drive, Bldg. 3, Suite 100
San Antonio, TX 78257
Telephone: 210-448-0500
PBoldt@WattsGuerra.com

THOMAS P. CARTMELL
WAGSTAFF & CARTMELL LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
Telephone: 816-701 1100
tcartmell@wcllp.com

SARAH EMERY
HENDY JOHNSON VAUGHN EMERY, PSC
2380 Grandview Drive
Ft. Mitchell, KY 41017
Telephone: 888-606-5297
semery@justicestartshere.com

CARRIE GOLDBERG
C.A. GOLDBERG, PLLC

1 16 Court St.
2 Brooklyn, NY 11241
3 Telephone: (646) 666-8908
4 carrie@cagoldberglaw.com

5 RONALD E. JOHNSON, JR.
6 **HENDY JOHNSON VAUGHN EMERY, PSC**
7 600 West Main Street, Suite 100
8 Louisville, KY 40202
9 Telephone: 859-578-4444
10 rjohnson@justicestartshere.com

11 SIN-TING MARY LIU
12 **AYLSTOCK WITKIN KREIS &**
13 **OVERHOLTZ, PLLC**
14 17 East Main Street, Suite 200
15 Pensacola, FL 32502
16 Telephone: 510-698-9566
17 mliu@awkolaw.com

18 JAMES MARSH
19 **MARSH LAW FIRM PLLC**
20 31 Hudson Yards, 11th floor
21 New York, NY 10001-2170
22 Telephone: 212-372-3030
23 jamesmarsh@marshlaw.com

24 HILLARY NAPPI
25 **HACH & ROSE LLP**
26 112 Madison Avenue, 10th Floor
27 New York, New York 10016
28 Telephone: 212.213.8311
hnappi@hrsclaw.com

EMMIE PAULOS
LEVIN PAPANTONIO RAFFERTY
316 South Baylen Street, Suite 600
Pensacola, FL 32502
Telephone: 850-435-7107
epaulos@levinlaw.com

RUTH THI RIZKALLA
THE CARLSON LAW FIRM, P.C.
1500 Rosecrans Ave., Ste. 500
Manhattan Beach, CA 90266
Telephone: 415-308-1915
rrizkalla@carlsonattorneys.com

ROLAND TELLIS
DAVID FERNANDES
BARON & BUDD, P.C.
15910 Ventura Boulevard, Suite 1600
Encino, CA 91436
Telephone: (818) 839-2333
Facsimile: (818) 986-9698

rtellis@baronbudd.com
dfernandes@baronbudd.com

MELISSA YEATES
JOSEPH E. MELTZER
KESSLER TOPAZ MELTZER & CHECK, LLP
280 King of Prussia Road
Radnor, PA 19087
Telephone: 610-667-7706
myeates@ktmc.com
jmeltzer@ktmc.com

DIANDRA “FU” DEBROSSE ZIMMERMANN
DICELLO LEVITT
505 20th St North Suite 1500
Birmingham, Alabama 35203
Telephone: 205.855.5700
fu@dicellolevitt.com

Plaintiffs’ Steering Committee Membership

Attorneys for Plaintiffs

ATTESTATION

I, Audrey Siegel, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: May 31, 2024

By: /s/Audrey Siegel
Audrey Siegel